



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

EPA Region 5 Records Ctr.



207078

REPLY TO THE ATTENTION OF:

SR-6J

August 22, 1996

Mr. Alan P. Bielawski, Esq.
Sidley & Austin
One First National Plaza
Chicago, Illinois 60603

**Re: Remedial Action Objectives
Lenz Oil Service Site
Lemont, Illinois**

Dear Mr. Bielawski:

U.S. EPA and Illinois EPA (the Agencies) have reviewed the proposed remedial action objectives (RAOs) for the Lenz Oil site submitted on August 8, 1996, by ERM-North Central. The Agencies propose the following three modifications:

- (1) Change the third Ground Water RAO to read: "Meet the chronic and acute Federal AWQC for protection of aquatic life in the Des Plaines River, as demonstrated by confirmatory samples from the river, groundwater samples from monitoring wells adjacent to the river, or projected discharge to the river determined by using an applicable dilution factor such as the one in the Baseline Risk Assessment"
- (2) Add a sixth Ground Water RAO which reads: "Restore the contaminated aquifer if technically practicable"
- (3) Change the first LNAPL RAO to read: "Remove as much as is technically practicable of the LNAPL"

We've proposed eliminating the reference to "cost-effectiveness" in the first LNAPL RAO because cost-effectiveness is one of the nine criteria in the NCP which will be considered in

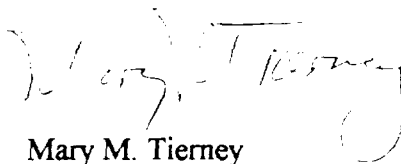
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selecting a remedy. In 40 CFR §300.430(e)(7)(iii), it states that "costs of construction and any long-term costs to operate and maintain the alternative shall be considered. Costs that are grossly excessive compared to the overall effectiveness of alternatives may be considered as one of several factors to eliminate alternatives."

We can discuss the RAOs further if the Lenz Oil Respondents would like to propose any modifications. Because the RAOs are a minor part of the FS report, however, the Agencies consider the resolution of the RCRA/TSCA issues and finalization of the remedial alternatives to be evaluated to be of more immediate concern. Please call me at (312) 886-4785 if you have any questions.

Sincerely,

A handwritten signature in dark ink, appearing to read "Mary M. Tierney", with a large, stylized loop at the end.

Mary M. Tierney
U.S. EPA

cc: Elsie Millano, ERM-North Central, Inc.
John Imse, ERM-North Central, Inc.
Diane Richardson, Commonwealth Edison
John Griggs, Commonwealth Edison
Jerry Willman, IEPA
Dick McAvoy, BVSPC
Stuart Hersh, USEPA